

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262-NRB ECF Case
THE BERKSHIRE BANK and GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO Individually and On Behalf of All Others Similarly Situated, Plaintiffs, v. BANK OF AMERICA CORPORATION, et al., Defendants.	Civil Action No. 12-CV-5723-NRB

**LENDER PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF
SETTLEMENTS WITH CREDIT SUISSE GROUP AG ("CREDIT SUISSE") AND THE
BANK OF TOKYO-MITSUBISHI UFJ, LTD., N/K/A MUFG BANK, LTD. ("MUFG")**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE, that on July 13, 2022 at 2:30 PM, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, Lender Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (a) granting final approval to the Settlements with Credit Suisse Group AG (“Credit Suisse”) and The Bank of Tokyo-Mitsubishi UFJ, Ltd., N/K/A MUFG Bank, Ltd. (“MUFG”); (b) certifying the Settlement Class; (c) granting final approval to the plan of distribution; (d) appointing Pomerantz LLP as Counsel for the Settlement Class; (e) granting final approval to the class notice, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Credit Suisse and MUFG are: (i) the Memorandum of Law in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Credit Suisse and MUFG; (ii) the Declaration of Jeremy Lieberman A. Lieberman in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Credit Suisse and MUFG; (iii) the Declaration of Jennifer M. Keough in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements.¹

Dated: June 8, 2022
New York, New York

POMERANTZ LLP
/s/ Jeremy A. Lieberman

¹ Lender Plaintiffs will submit a Proposed Order after the opt-out (June 22, 2022) and objection deadline (June 22, 2022) and in advance of the Fairness Hearing (July 13, 2022).

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*Counsel for Plaintiffs The Berkshire
Bank and The Government
Development Bank of Puerto Rico*

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2022, I caused the foregoing, along with the accompanying memorandum and declarations in support, to be electronically filed with the Clerk of the Court using CM/ECF system, which will automatically send email notification of such filing to the attorneys of record registered in the CM/ECF system.

Dated: June 8, 2022

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman